

REMARKS/ARGUMENTS

This Request for Reconsideration is being submitted in response to the Final Office Action dated November 3, 2004. This Request for Reconsideration is being submitted within the time period for response extending to February 3, 2005. Additionally, please note that this Request for Reconsideration is being submitted within the two-month period extending from the date of the Final Office Action to January 3, 2005.

Claims 1-17 are currently pending.

Claims 18-24 have been cancelled.

Rejections Under 35 U.S.C. § 103

Claims 1-17 were rejected under 35 U.S.C. 103(a) as being unpatentable over Axberg et al. ("Axberg" hereafter) (U.S. Pat. No. 6,009,466) in view of Ofer et al. ("Ofer" hereafter) (U.S. Pat. No. 5,890,204). These rejections are traversed.

The Office has indicated that claims 1-17 are presently rejected under the same grounds of rejection as set forth in the Office Action mailed March 29, 2004. The Applicants continue to submit that the grounds of rejection as set forth by the Office in the Office Action mailed March 29, 2004, are inappropriate. Therefore, the arguments submitted by the Applicants in the Amendment dated July 30, 2004, continue to be asserted against the rejections set forth in the Office Action mailed March 29, 2004. Additionally, the Office is requested to consider the following supplemental arguments against the current rejections of claims 1-17.

With respect to independent claims 1 and 3, the Office continues to selectively address features of each claim without considering the combined elements and limitations of each claim as a whole. The Office is reminded that when determining the differences between the prior art and the claims, the question under 35 U.S.C. 103 is not whether the

differences themselves would have been obvious, but whether the claimed invention as a whole would have been obvious. *Stratoflex, Inc. v. Aeroquip Corp.*, 713 F.2d 1530, 218 USPQ 871 (Fed. Cir. 1983).

The following features of claim 1 should be considered as a whole when being evaluated against the cited art of record:

"a graphical user interface provided by the client component at a client computer system," and

"the graphical user interface being defined to enable a user to physically build and modify the RAID array of disks of the storage enclosure connected to the server computer system from the client computer system without requiring the user to locally interact with the server computer system."

The following features of claim 3 should be considered as a whole when being evaluated against the cited art of record:

"a graphical user interface provided by the client component at a client computer system," and

"the graphical user interface being defined to provide functional tools to enable a user of the client computer system to physically build a RAID array of disks either from scratch or through application of a RAID building template without requiring the user to locally interact with the server computer system."

With respect to claims 1 and 3, the combination of Axberg and Ofer fails to teach at least the following features:

"a graphical user interface provided by the client component at a client computer system."

The Office has admitted that Axberg does not teach the graphical user interface provided by the client component at the client computer system. The Applicants agree with this admission by the Office. However, the Office has asserted that Ofer teaches the graphical user interface provided by the client component at the client computer system. The Applicants disagree with this assertion by the Office.

Ofer (column 2, lines 26-30) teaches that a storage controller (12) is connected to an array of disk storage devices (14). Ofer (column 2, lines 30-33) further teaches that the storage controller (12) is connected to a host computer (20). Claim 1 requires "a storage enclosure connected to a server computer system having the server component, the storage enclosure having a RAID array of disks." Because the host computer (20) of Ofer is required to be connected to the storage controller (12), the Office has asserted that the server computer system of claim 1 is represented by the host computer (20) of Ofer. However, the Office has been silent with regard to Ofer's outward teaching that the graphical user interface of Ofer is provided at the host computer (20). For example, Ofer (column 1, lines 59-60) states that the graphical user interface is presented to a user at the host computer (20). Additionally, Ofer (column 4, lines 53-58) teaches that the graphical user interface is used at the host computer (20).

In contrast to the teachings of Ofer, claim 1 requires that a graphical user interface be provided by the client component at a client computer system, as opposed to being provided by the server computer system. Notwithstanding the fact that the graphical user interface of Ofer is not equivalent to the graphical user interface of the present invention, the above-mentioned teachings of Ofer would lead one skilled in the art to understand that the graphical user interface is to be provided by the server computer system to which the storage enclosure is connected.

With respect to claim 1, the combination of Axberg and Ofer fails to teach at least the following features:

"the graphical user interface being defined to enable a user to physically build and modify the RAID array of disks of the storage enclosure connected to the server computer system from the client computer system without requiring the user to locally interact with the server computer system."

Axberg does not include any teachings regarding the physical building and modification of a RAID array of disks. The teachings of Axberg are merely directed to a tool for PLANNING a configuration of a storage network. The teachings of Axberg with regard to planning the configuration of the storage network are apparent throughout the disclosure of Axberg. For example, Axberg (column 10, lines 62-64) states that "In operation, the storage management program of the preferred embodiment is used to interactively plan a storage network configuration." Furthermore, Axberg (column 15, lines 49-50) states that the "Storage management program 331 may offer the option to save/print a configuration in various forms."

Because Axberg is silent with regard to physically building and modifying the RAID array of disks, it is not reasonable to conclude that Axberg teaches any portion of the claim 1 feature requiring "the graphical user interface being defined to enable a user to physically build and modify the RAID array of disks of the storage enclosure connected to the server computer system from the client computer system without requiring the user to locally interact with the server computer system."

Additionally, as previously discussed, Ofer does not teach that the graphical user interface is provided at the client computer system. According to Ofer, use of the graphical user interface to cause a change in the storage enclosure must be performed at the server computer system, because the graphical user interface is only provided at the server

computer system. Therefore, in addition to Axberg, Ofer also fails to teach a graphical user interface that enables a user to physically build or modify a storage enclosure connected to a server computer, from a client computer system, without requiring local user interaction with the server computer system.

With regard to features of claim 3 that are similar to features of claim 1, the Axberg and Ofer references fail to teach the similar features of claim 3 for the same reasons discussed above with respect to claim 1. Furthermore, claim 3 includes the following feature:

"the graphical user interface being defined to provide functional tools to enable a user of the client computer system to physically build a RAID array of disks either from scratch or through application of a RAID building template without requiring the user to locally interact with the server computer system."

The Applicants submit that neither Axberg nor Ofer teach a functional tool (provided by a graphical user interface) that enables physical building of a RAID array of disks either from scratch or through application of a RAID building template, particularly without requiring the user to locally interact with the server computer system.

In view of the foregoing, the Applicants submit that the combination of Ofer and Axberg fail to teach each and every feature of claims 1 and 3, as required to establish a case of prima facie obviousness. Therefore, the Applicants respectfully request the Office to withdraw the rejections of claims 1 and 3. Also, since each of claims 2 and 4-17 ultimately depend from one of claims 1 and 3, the Applicants submit that each of claims 2 and 4-17 are patentable for at least the reasons provided above for claims 1 and 3. Therefore, the Applicants respectfully request the Office to withdraw the rejections of claims 2 and 4-17.

Accordingly, a notice of allowance is respectfully requested. If the Examiner has any questions concerning the present Request for Reconsideration, the Examiner is kindly requested to contact the undersigned at (408) 749-6900 ext. 6914. If any other fees are due in connection with filing this Request for Reconsideration, the Commissioner is also authorized to charge Deposit Account No. 50-0805 (Order No. ADAPP091A). A duplicate copy of the transmittal is enclosed for this purpose.

Respectfully submitted,
MARTINE & PENILLA, LLP



Kenneth D. Wright
Reg. No. 53,795

710 Lakeway Drive, Suite 200
Sunnyvale, CA 94085
Telephone: (408) 749-6900
Customer Number 25,920